

1 ROB L. PHILLIPS
2 Nevada Bar No. 8225
3 Rob.phillips@fisherbroyles.com
4 FISHERBROYLES, LLP
5 5670 Wilshire Blvd.
6 Suite 1800
7 Los Angeles, California 90036
8 Telephone: (702) 518-1239
9 *Counsel for Plaintiff*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WEBSITE MANAGEMENT SYSTEMS,
13 LLC, a Nevada Limited Liability
14 Company

15 Plaintiff,

16 v.

17 BENJAMIN DAILED A, an individual
18 residing in Nevada, MELVIN OMAN, an
19 individual residing in Nevada, DEVAN
20 HIRST, an individual residing in Nevada,
21 YES WE WILL, INC., a Nevada
22 Corporation, and DOES 1-X,

23 Defendants.

Case No.: 2:20-cv-00213

24 **DECLARATION OF CHRISTINE**
25 **MACLOLEK IN SUPPORT OF MOTION**
26 **FOR PRELIMINARY INJUNCTION**

27 **DECLARATION**

28 I, Christine Maclolek, declare as follows:

1. I am the Assistant Client Services Manager for Website Management Systems, LLC ("WMS"). I was hired by WMS on February 1, 2019.

2. On January 22, 2020, Fely Alzona, an existing customer of WMS, contacted me and asked why she was being contacted by another company about the same search engine optimization services she had signed up with WMS to provide after she was told that WMS provides unique services.

3. Fely Alzona identified 1st Page Group as the entity that contacted her inquiring about providing the search engine optimization services and asking her to leave WMS. Fely

1 Alzona also detailed 1st Page Group using the same sales pitch, pitch materials, including website
2 demo, and search engine optimization process as WMS.

3
4 I declare under penalty of perjury pursuant to the laws of the United States of America that
5 the foregoing is true and correct.

6
7 Dated: March 2, 2020



8 CHRISTINE MACLOLEK
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28